

**Fill in this information to identify the case:**Debtor 1 RACHELLE ELAINE CASSELLDebtor 2  
(Spouse, if filing)United States Bankruptcy Court for the: Middle District of PennsylvaniaCase number 1:19-bk-04526-HWV

Form 4100R

**Response to Notice of Final Cure Payment**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

**Part 1: Mortgage Information**Name of Creditor: Freedom Mortgage CorporationCourt claim no. (if known):  
18Last 4 digits of any number you use to identify the debtor's account: 0413Property address: 87 Smith Road  
Number Street  
Gardners, PA 17324  
City State ZIP Code**Part 2: Prepetition Default Payments**

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

**Part 3: Postpetition Mortgage Payment**

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 01/01/2025  
MM/DD/YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_
- b. Total fees, charges, expenses, escrow, and costs outstanding: +(b) \$ \_\_\_\_\_
- c. **Total.** Add lines a and b. (c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

\_\_\_\_\_  
MM/DD/YYYY



Debtor1 RACHELLE ELAINE CASSELL  
First Middle Last

Case number (if known) 1:19-bk-04526-HWV

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- all payments received;
- all fees, costs, escrow, and expenses assessed to the mortgage; and
- all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.**

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/Mario Hanyon Date 12/03/2024  
Signature

Print Mario Hanyon Title Attorney  
First Name Middle Name Last Name

Company Brock & Scott, PLLC

**If different from the notice address listed on the proof of claim to which this response applies:**

Address 3825 Forrestgate Dr.  
Number Street  
Winston-Salem, NC 27103  
City State ZIP Code

Contact phone 844-856-6646 Email PABKR@brockandscott.com

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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**  
*Harrisburg Division*

IN RE:

RACHELLE ELAINE CASSELL

Case No. 1:19-bk-04526-HWV

Chapter 13

Freedom Mortgage Corporation,

Movant

vs.

RACHELLE ELAINE CASSELL ,

Debtor

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing Response to Notice of Final Cure Payment has been electronically served or mailed, postage prepaid on this day to the following:

Via Electronic Notice:

Kara Katherine Gendron, Debtor's Attorney  
125 State Street  
Harrisburg, PA 17101  
karagendron@gmail.com

Jack N Zaharopoulos, Bankruptcy Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036

United States Trustee, US Trustee  
US Courthouse  
1501 N. 6th St  
Harrisburg, PA 17102

Via First Class Mail:

RACHELLE ELAINE CASSELL  
87 SMITH ROAD  
GARDNERS, PA 17324

Date: December 3, 2024

*/s/Mario Hanyon*

Andrew Spivack, PA Bar No. 84439

Matthew Fissel, PA Bar No. 314567

Mario Hanyon, PA Bar No. 203993

Ryan Starks, PA Bar No. 330002

Jay Jones, PA Bar No. 86657

Attorney for Creditor

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